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August 4, 2014

VIA ECF

The Honorable Denise L. Cote
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 1610
New York, NY 10007-1312

DOCUMENT

TRANSMITTED ELECTRONICALLY

8/11/2014

Re: FHFA v. HSBC North America Holdings, Inc., et al., 11 Civ. 6189 (DLC)

Dear Judge Cote:

We write on behalf of the Plaintiff Federal Housing Finance Agency ("FHFA") regarding proposed redactions to the materials supporting FHFA's Reply Memorandum of Law in Support of Its Motion for Partial Summary Judgment on Defendants' Due Diligence and Reasonable Care Defenses (the "Reply"), which will be filed later today in the above-captioned Action. Because the parties have designated some of the documents filed as exhibits in support of the Reply as "Confidential" under the First Amended Protective Order, and because certain parts of the Reply may contain Non-Party Borrower Information (as defined in paragraph 2.8 of the First Amended Protective Order), FHFA is filing these documents with the Court under seal, pursuant to paragraph 9 of the First Amended Protective Order.

FHFA intends to propose redactions to certain of the materials filed in support of the Reply, and also wishes to give Defendants an opportunity to propose any redactions they think are necessary. To facilitate that process, FHFA respectfully requests that the parties be given until Monday, August 11, 2014, to meet and confer regarding proposed redactions, and that the parties file a joint submission to the Court on Thursday, August 14, 2014, listing the proposed redactions to which neither party objects and those to which a party objects. HSBC consents to this proposed schedule.

Thank you for Your Honor's consideration of this submission.

Approved.
Quinn Emanuel
Aug. 11, 2014

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U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
AUG 11 2014

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Respectfully submitted,

/s/ Philippe Z. Selendy

Philippe Z. Selendy

Jonathan B. Oblak

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CC: Counsel of record (via ECF)